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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/29/12

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May 23, 2012

Via Facsimile

Honorable Harold Baer
United States District Court
Southern District of New York
500 Pearl Street, Chambers 2230
New York, New York 10007

Re: *Maclaren Europe Limited v. ACE American Insurance Company*
Case No. 11-cv-04688-HB
Our File No.: 1560-007753

Dear Judge Baer:

We represent ACE American Insurance Company ("ACE") and are writing respectively on behalf of both parties, ACE and Maclaren Europe Limited ("MEL"), to request an extension of the summary judgment briefing deadline, from June 11 to June 29, 2012. This is the first request for an extension of this deadline.

As your Honor may recall, pursuant to our letter dated March 21, 2012, the Court extended the discovery deadline from April 15 to May 11, 2012, due to the circumstances addressed in our letter. We recently conducted the deposition of Farzad Rastegar on May 10, 2012, and are awaiting the transcript. We also are in the process of trying to resolve issues related to ACE's subpoena on non-party Garda LLC. We understand that certain Garda documents were turned over to the bankruptcy trustee for Maclaren USA, Inc., and we are seeking to obtain those documents as soon as possible, which may resolve those issues.

The parties have conferred and agreed on the following briefing schedule, provided the Court is agreeable to the short extension: moving briefs to be served on June 13, 2012, and opposition/reply briefs to be served and filed on June 29, 2012. Both parties are moving for summary judgment and, therefore, we agreed that a moving brief and a single opposition/reply brief would be sufficient. An extension of the summary judgment deadline to June 29 is three months in advance of the trial month, and thus is in accord with the requirements set forth in the Pretrial Scheduling Order.

Respectfully submitted,

/s/ J. Gregory Lahr

J. Gregory Lahr
Sedgwick LLP

cc: Paul Hugel, Esq. (via email)

NY/858693v1

Extension granted to June 25th

SO ORDERED:

Harold Baer, Jr., U.S.D.J.

Date: 5/23/12